



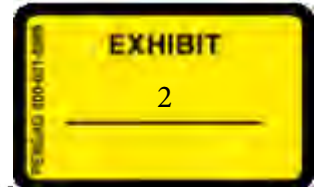
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February 8, 2021

Honorable Brett Ludwig
United States District Judge
Eastern District of Wisconsin
511 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE: *United States v. Steven R. Brandenburg*
Case No. 21-CR-25

Your Honor,

I represent Advocate Aurora Healthcare (AAH), a victim in the above-captioned case. As such, I am submitting this letter to the Court as a victim impact statement concerning the detention or release of Steven Brandenburg at his expected initial appearance and guilty plea hearing on February 9, 2021, at 10:00 a.m. On behalf of AAH, and all its team members located at the Aurora Medical Center (AMCG) in Grafton, WI, I am requesting that the Court remand Brandenburg to custody of the United States Marshal after his guilty plea for the following reasons:

1. When Brandenburg reported for work at the Inpatient Pharmacy at AMCG on the night of 12/23/20, he knew AMCG had received a shipment of Moderna COVID-19 vaccine on 12/22/20. He also knew several doses had been administered to AMCG team members earlier in the day on 12/23/20. Later during his shift, Brandenburg researched the refrigeration requirements for the Moderna COVID-19 vaccine with the intent of sabotaging it before the next scheduled vaccination clinic for AMCG team members on the morning of 12/26/20. His research revealed that the vaccine would have to be used within 12 hours of removing it from refrigeration.
2. With the intent to sabotage the vaccine and render it ineffective, Brandenburg removed the vaccine from the refrigerator for several hours during his over-night





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work shift between 12/24/20 and 12/25/20. Brandenburg again removed the vaccine from the refrigerator for several hours during his over-night work shift between 12/25/20 and 12/26/20 with the intent to sabotage the vaccine and render it ineffective.

3. The third shift pharmacy technician for the Inpatient Pharmacy found the box of Moderna vaccine outside of the refrigerator during the early morning hours of 12/26/20. She put the box back into the refrigerator and texted her supervisor at the end of her shift to contact her. Not knowing that the vaccine had been taken out of the refrigerator earlier that day, the vaccination clinic for AMCG team members began at 8:00. The pharmacy technician and her supervisor connected during a call at 8:22 a.m. and the technician reported her finding and told the supervisor she had last been at the refrigerator where the vaccine was stored at about midnight. The supervisor reported the finding to her superiors at AMCG and AAH. The supervisor tried to contact Brandenburg to obtain more information with no success. Believing the vaccine had been left out by mistake during the early morning hours of 12/26/20, and the vaccine could be used until approximately 12:00 p.m. on 12/26/20, a decision was made to continue with the clinic scheduled that morning and recruit more team members for vaccinations to not waste the remaining vaccination doses.
4. When contacted by his supervisor at 12:24 p.m. on 12/26/20, Brandenburg lied and said he left AMCG's Moderna COVID-19 vaccine out by mistake. He again lied to the supervisor at 12:34 p.m. Brandenburg lied to co-workers between 12/26/20 and 12/29/20, including those who received the vaccine on 12/26/20, by saying he left the vaccine out by mistake. He again lied when interviewed by AAH Public Safety Officers on 12/29/20 by saying he left the vaccine out by mistake.
5. Brandenburg later admitted that on December 25 and 26, 2020, he intentionally sabotaged all Moderna vaccine he knew was intended for his co-workers at AMCG. He made these admissions to AAH Public Safety officers on December 30, 2020, the Grafton Police Department on December 31, 2020, and the FBI on January 8, 2021.
6. It was common for Brandenburg to berate and intimidate his co-workers in the Inpatient Pharmacy at AMCG and other team members at AMCG for months leading up to the vaccine sabotage based on their vaccination, religious, and government beliefs. Brandenburg has also told co-workers that he would do





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“anything necessary” to prevent his daughters from being vaccinated, up to and including losing placement of his children. As a result, several of Brandenburg’s co-workers had expressed concerns about Brandenburg’s mental health and several co-workers made complaints to Brandenburg’s immediate supervisor regarding their concerns prior to December 25, 2020.

7. During AAH’s internal investigation related to Brandenburg’s actions on December 25 and 26, 2020, it was discovered that Brandenburg manipulated his annual flu vaccine required of all AAH team members unless excused for religious or medical reasons. Instead of submitting a request for waiver for the annual flu vaccine, Brandenburg faked his flu shot. To accomplish this task, Brandenburg took a syringe of saline and labelled the syringe with information consistent with legitimate team member flu vaccine. He then took the fake flu vaccine to a nurse conducting flu vaccinations, and in the capacity of an AMCG pharmacist, he told the nurse to vaccinate him. The investigation revealed that Brandenburg also faked the flu vaccine in a similar way for two co-workers. The two co-workers told investigators that Brandenburg manipulated them into submitting the fake flu vaccine. The investigation further revealed that Brandenburg may have also prepared fake flu vaccine for his wife, an AAH employee at the time, and another co-worker who no longer is an AAH employee.
8. Multiple co-workers have described Brandenburg bringing firearms and ammunition to AMCG on his person and in a rolling brief case in ways that may violate state laws and violate AAH’s Code of Conduct, AAH’s policy regarding no weapons on premises, and AMCG’s clear signage at every entrance that no weapons are allowed on the premises.
9. Brandenburg has been to several of his co-workers’ residences or is aware of where they live.

As a result of Brandenburg’s actions and admissions, AAH took the following immediate actions:

- Terminated Brandenburg’s employment on 12/30/20.
- Reported the incident to the Grafton Police Department on the evening of 12/30/20.





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- Activated a Personal Safety Plan on 12/30/20 for the co-worker who reported Brandenburg's actions on 12/26/20. The plan included a physical security risk assessment of the AMCG Inpatient Pharmacy, tested panic button activation and notification process with the Public Safety Command Center, and virtual escort protocol initiated by identifying cameras and best path of access into the inpatient pharmacy.
- Issued a Security Alert on 12/30/20 for Brandenburg on the AMCG premise. However, due to Brandenburg's generalized physical description and mask requirements due to the COVID-19 pandemic, it has been exceptionally difficult to implement safety precautions to identify whether he is on premises.
- Issued a Threat Assessment that Brandenburg is a high-risk termination, he has made threatening comments towards a co-worker, and he is known to have concealed weapons on and off premises.
- Movement of the original COVID vaccine site from a large conference near a convenient public entrance with several large exterior windows facing the parking lot, to two smaller adjacent conference rooms away from the public entrance within the interior of AMCG and with no exterior windows.

Multiple advanced physical security measures were also implemented at the Grafton site at the onset of this event. Among those measures, all access points into the building were restricted, which required re-routing all team members and patients to park and access the site in unfamiliar ways, which in some cases were contrary to fixed wayfinding signage. The restriction of access was done so Public Safety could have increased knowledge and control over who is entering the building. Public Safety also did not want to risk team members inadvertently providing entry into the building to Steve Brandenburg. This creates serious disruption and adds anxiety with our patients, some of whom have cognitive or physical mobility limitations. This also created challenges and inconvenience for 2nd and 3rd shift team members who must walk additional distances in inclement weather to enter the building. The restricted access created a particular hardship for the "on-call" surgical and obstetrics team members who in response to an emergency or a delivery when seconds matter is unable to access the building through traditional entrances.

In addition, AAH Public Safety had to rapidly augment additional staffing resources to the AMCG location to support increased activity and safety needs. This required pulling Public Safety staffing resources from other area hospitals that regularly observe higher levels of security events





(St. Luke's, Sinai, and West Allis). This subsequently decreased those site's ability to mitigate security and safety risks and caused a serious disruption to security operations. Some of the resources added included the following:

- Added two additional Public Safety Officers on each shift Monday through Friday and one additional Public Safety Officer on each shift Saturday & Sunday.
- Moved an additional Public Safety Patrol Vehicle to Grafton for the officers to patrol the campus grounds as a visible deterrent.
- This event required full-time assignment of an investigator from the Public Safety Department, a Compliance officer, and three Human Resource supervisors which directly undermined AAH's ability to adequately support investigational process across the entire AAH system (25 hospitals and approximately 600 clinics) for over a month.

Media presence at the AMCG site has also required constant surveillance and management by on-site Public Safety team members, which strained AAH's ability to meet routine service needs and other mitigative tasks that directly impact overall safety to all patients and team members.

The impact of Brandenburg's actions before and on December 25 and 26, 2020 has had a tremendous effect on the safety and security of his co-workers, team members, and patients at AMCG and throughout the AAH system. AMCG team members lost a well-established sense of personal safety and normalcy at their workplace that took years of around-the-clock work on behalf of the Public Safety team to build. Media reports of Brandenburg's large cache of weapons, coupled with his emotional distress from personal family issues, concerning ideologies, emotional manipulation of his fellow team members, loss of professional license and career, and his known hobby of building his own weapons piecemeal (complicated by law enforcement's legal limitations around tracking and seizing those), created an ongoing, justified, and constant fear around the risk of an active shooter event.

All AMCG team members were already vulnerable from the stress and challenges brought on by the pandemic to meet the health needs of our community under extreme circumstances. Brandenburg's actions added unnecessary toil, angst, and stress to this already exhausted population, which gave increased potential to impact the quality of the overall delivery of care.





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While Brandenburg was detained immediately following the arrest by local authorities, team members at AMCG expressed a sense of safety and a letting down of their guard. When Brandenburg was released on bail conditions in the local matter, despite the no contact order, the sense of fear and anxiety blanketed the building again. When asked what else might be done to alleviate these concerns, team members have expressed that there is not much else to do, other than Brandenburg be detained.

Dated at Milwaukee, Wisconsin this 8th day of February, 2021.

Respectfully submitted,

By:


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